

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE:**           **BLAIR W HOWELL**                 : **CHAPTER 13**  
  : **BANKRUPTCY NO. 23-12471-djb**  
**DEBTOR**    :

**DEBTOR'S OBJECTION TO THE  
CERTIFICATION OF DEFAULT BY PNC BANK**

TO THE HONORABLE DEREK J BAKER, U.S. BANKRUPTCY JUDGE:

Movant/Debtor, **BLAIR W. HOWELL**, by and through his attorney, **MICHAEL SCHWARTZ, ESQUIRE**, hereby files this Objection to the Certification of Default filed by PNC Bank, Respondent/Creditor, and in support thereof, avers as follows:

1. On May 14, 2025, Movant/Creditor PNC Bank, filed a Certification of Default with this Court alleging that Debtor was in arrears on their mortgage in the amount of \$5,473.09 per a Notice of Default issued on April 18, 2025.
2. The sole reason that Movant/Creditor filed the Certification of Default is because of the alleged arrears in the mortgage payments.
3. Debtor has made payments to Movant/Creditor since the notice of default letter in the amount alleged on the Notice of Default. Specifically, an electronic payment to PNC Bank has been made by Debtor to cure - \$5473.09 on May 16, 2025 (confirmation # 1028382592).
4. Debtor has cured the notice of default.

**WHEREFORE**, Debtor respectfully requests that this Court deny Creditor's request to sign the Order submitted to the Court and declare that the automatic stay is still in effect.

Respectfully submitted,  
\s\ Michael Schwartz  
**MICHAEL SCHWARTZ, ESQUIRE**  
 Attorney for Debtor